

FILED
At Albuquerque NMJUN 30 2016 *ml*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**BRENT WILLIAMS and
JOVAS BROWN,**

Defendants.

CRIMINAL NO. 16-2913 WJ

Count 1: 21 U.S.C. §§ 846 Conspiracy;

Counts 2 and 3: 21 U.S.C. §§ 841(a)(1)
and (b)(1)(B): Distribution of 5 Grams
and More of Methamphetamine; 18
U.S.C. § 2: Aiding and Abetting;Count 4: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(A): Distribution of 50 Grams and
More of Methamphetamine;Count 5: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Distribution of 28 Grams and
More of Cocaine Base; 18 U.S.C. §
2: Aiding and Abetting;Count 6: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(A): Distribution of 50 Grams and
More of Methamphetamine.INDICTMENT

The Grand Jury charges:

Count 1

On or about May 16, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **BRENT WILLIAMS** and **JOVAS BROWN**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other, and with persons known and unknown to the Grand Jury, to commit an offense against the United States, distribution of 5 grams and more of a mixture and substance containing a detectable amount of methamphetamine contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

In violation of 21 U.S.C. § 846.

Count 2

On or about May 16, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **BRENT WILLIAMS** and **JOVAS BROWN**, unlawfully, knowingly and intentionally distributed a controlled substance, 5 grams and more of methamphetamine.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 3

On or about May 16, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **BRENT WILLIAMS** and **JOVAS BROWN**, unlawfully, knowingly and intentionally distributed a controlled substance, 5 grams and more of methamphetamine.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 4

On or about May 23, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **BRENT WILLIAMS**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams of and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 5

On or about May 26, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **BRENT WILLIAMS** and **JOVAS BROWN**, unlawfully, knowingly and intentionally distributed a controlled substance, 28 grams and more of a mixture and substance containing a detectable amount of cocaine base.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 6

On or about June 7, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **BRENT WILLIAMS**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

FORFEITURE ALLEGATION

Counts 1 through 6 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States pursuant to 21 U.S.C. § 853.

Upon conviction of any offense in violation of 21 U.S.C. § 841 or § 846, the defendants, **BRENT WILLIAMS** and **JOVAS BROWN**, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which he is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses.

The property to be forfeited to the United States includes but is not limited to the following:

MONEY JUDGMENT

A sum of money of approximately \$6,550.00 in U.S. currency equal to the amount of proceeds obtained as a result of the offenses in Counts 1 through 6.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

G. C. Macello
Assistant United States Attorney

KAB 06/28/16 1:19PM